

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

| | | |
|---------------------------|---|--|
| In re: | : | Chapter 11 |
| | : | |
| Innovation Transport LLC, | : | Case No. 23-14223(SLM) |
| | : | |
| Debtor. | : | Hearing Date: September 12, 2023 at 11:00 a.m. |
| | : | |

DECLARATION OF JAMES J. STIVES


I, James J. Stives, of full age, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a Bankruptcy Analyst for the Office of the United States Trustee and have full knowledge of the facts set forth herein.
2. On May 18, 2023 (the "Petition Date"), Innovation Transport LLC (the "Debtor") filed a Voluntary Petition for Non-Individuals Filing for Bankruptcy (the "Petition") for relief under Chapter 11 of title 11, United States Code (the "Bankruptcy Code" or the "Code"). *See*, ECF No. 1. The Debtor remains in possession of its assets and financial affairs pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. A review of the docket indicates that, as of this date, the Debtor has not filed any Monthly Operating Report since the inception of this case. With that, Monthly Operating Reports for the stub-period of May 2023, and the month of June 2023 remain past due.

4. On June 21, 2023, the 341 Meeting of Creditors (the "341 Meeting") was conducted. At the conclusion of the 341 Meeting, certain information requests were made of the Debtor by the Office of the United States Trustee. On July 31, 2023, these information requests were again communicated by e-mail. *See*, Exhibit A, attached. To date, the Office of the United States Trustee has not received such information requested at the conclusion of the 341 Meeting from the Debtor.

I certify under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

By:  /s/ James J. Stives
James J. Stives
Bankruptcy Analyst

Dated: August 1, 2023

From: Gerardi, David (USTP) <David.Gerardi@usdoj.gov>

Sent: Monday, July 31, 2023 2:05 PM

To: Sebastian Duarte <sduarte@scura.com>; Stives, James J. (USTP) <James.J.Stives@usdoj.gov>

Cc: David Stevens <dstevens@scura.com>

Subject: RE: Innovation Transport LLC - Client Documents Received

David,

As a reminder, at the 341, our office asked for

1. the loan documents for any and all PPP loans,
2. an accounting of how those funds were spent,
3. the lease agreement with Innovation Transit
4. and amended schedules reflecting the landlord for the virtual office (and that that landlord be served with notice of the bankruptcy)

Thank you,

Dave Gerardi, Trial Attorney
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